

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BRICKLAYERS' & ALLIED
CRAFTWORKERS LOCAL #2 ALBANY,
NY PENSION FUND, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

NEW ORIENTAL EDUCATION &
TECHNOLOGY GROUP INC.,
CHENGGANG ZHOU, MICHAEL
MINHONG YU and ZHIHUI YANG,

Defendants.

Case No. 1:22-cv-01014-VM-RWL

ANDRES MIJARES-ORTEGA, Individually
and on Behalf of All Others Similarly Situated,

Plaintiff,

v.

NEW ORIENTAL EDUCATION &
TECHNOLOGY GROUP INC.,
CHENGGANG ZHOU, MICHAEL
MINHONG YU, and ZHIHUI YANG,

Defendants.

Case No. 1:22-cv-01876-VM-RWL

**NOTICE OF THE MOTION OF PUBLIC EMPLOYEES' RETIREMENT
SYSTEM OF MISSISSIPPI FOR CONSOLIDATION OF
RELATED ACTIONS, APPOINTMENT AS LEAD PLAINTIFF,
AND APPROVAL OF SELECTION OF COUNSEL**

PLEASE TAKE NOTICE that on a date and at a time designated by the Court, before the Honorable Victor Marrero, at the United States District Court for the Southern District of New York, located at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, putative class member Public Employees' Retirement System of Mississippi ("Mississippi"), by its undersigned counsel, will respectfully move this Court for entry of an Order for: (1) consolidation of the above-captioned actions pursuant to Federal Rule of Civil Procedure 42(a); (2) appointment of Mississippi as Lead Plaintiff pursuant to the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), 15 U.S.C. § 78u-4(a)(3)(B); (3) approval of the selection of Kessler Topaz Meltzer & Check, LLP as Lead Counsel for the class; and (4) any such further relief as the Court may deem just and proper.¹

This Motion is made on the grounds that Mississippi is the "most adequate plaintiff" pursuant to the PSLRA. In support of this Motion, Mississippi submits herewith an accompanying memorandum of law and the Declaration of Naumon A. Amjad.

Dated: April 5, 2022

Respectfully submitted,

**KESSLER TOPAZ MELTZER
& CHECK, LLP**

S/ Naumon A. Amjad

Naumon A. Amjad
Darren J. Check
Ryan T. Degnan

¹ Counsel for Mississippi understand that Rule II.A.1 of the Individual Practices of United States District Judge Victor Marrero instructs parties to request a pre-motion conference before filing this Motion. This Motion has been filed pursuant to Section 21D(a)(3)(A)-(B) of the Securities Exchange Act of 1934, as amended by the PSLRA. Section 21D(a)(3)(A)-(B) provides that within sixty days after publication of the required notice, any member of the proposed class may apply to the Court to be appointed as lead plaintiff, whether or not they have previously filed a complaint in the underlying action. Consequently, counsel for Mississippi cannot determine who the competing lead plaintiff candidates are, if any, at this time. Accordingly, Mississippi respectfully requests that this requirement of the Court's Individual Practices be waived for purposes of this Motion.

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System of Mississippi, and Proposed Lead
Counsel for the Class*